

**MONTANA DEPARTMENT OF ENVIRONMENTAL QUALITY**  
**Permitting and Compliance Division**  
**1520 E. 6th Avenue**  
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**TECHNICAL REVIEW DOCUMENT FOR OPERATING PERMIT #OP2809-01**

**Louisiana-Pacific Corporation - Belgrade Facility**  
**400 Jack Rabbit Lane**  
**Belgrade, MT 59714**  
**SE ¼, Section 2, Township 1 North, Range 4 East, Gallatin County**

The following table summarizes the air quality programs testing, monitoring, and reporting requirements applicable to this facility.

<b>Facility Compliance Requirements</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>
Source Tests Required	X		Method 5, Method 9
Ambient Monitoring Required		X	
COMS Required		X	
CEMS Required		X	
Schedule of Compliance Required		X	
Annual Compliance Certification and Semiannual Reporting Required	X		As Applicable
Monthly Reporting Required		X	
Quarterly Reporting Required		X	
<b>Applicable Air Quality Programs</b>			
- ARM Subchapter 7 Preconstruction Permitting	X		Permit #2809-05
- New Source Performance Standards (NSPS)		X	
- National Emission Standards for Hazardous Air Pollutants (NESHAPS)		X	Except for 40 CFR 61, Subpart M
- Maximum Achievable Control Technology (MACT)		X	
- Major New Source Review (NSR)		X	
- Prevention of Significant Deterioration (PSD)		X	
- Risk Management Plan Required (RMP)		X	
- Acid Rain Title IV		X	
- State Implementation Plan (SIP)	X		General SIP

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## SECTION I. GENERAL INFORMATION

### A. Purpose

This document establishes the basis for the decisions made regarding the applicable requirements, monitoring plan, and compliance status of emission units affected by the operating permit proposed for this facility. The document is intended for reference during review of the proposed permit by the United States Environmental Protection Agency (EPA) and the public. It is also intended to provide background information not included in the operating permit and to document issues that may become important during modifications or renewals of the permit. Conclusions in this document are based on information provided in the original application submitted by Louisiana-Pacific (L-P) on June 6, 1996, and additional submittals received by the Department of Environmental Quality (Department) on March 3, 1999, March 8, 1999, March 18, 2002, May 17, 2002, February 13, 2003.

### B. Facility Location

L-P's Belgrade facility is located north of Interstate 90 at SE ¼, Section 2, Township 1 North, Range 4 East, Gallatin County, in the town of Belgrade, Montana.

### C. Facility Background Information

The Belgrade facility produces stud grade lumber. The studmill falls under Standard Industrial Classification (SIC) code 2421 and consists of a sawmill, drying kilns and planer. The facility is supported by two boilers for the production of steam used in the drying process. The main boiler is a Wellons Wicks hog fuel fired boiler rated at 16,000 pounds/hour of steam. As a backup, L-P also operates a Cleaver Brooks natural gas fired boiler with a maximum capacity of 13,000 pounds/hour of steam.

The Wellons boiler was installed in 1969 under Preconstruction Permit #84-122369. Permit #2809-00 was issued on February 4, 1994, for the installation of a multiclone on the Wellons boiler and replaced Permit #84-122369. Permit #2809-01 was issued on November 19, 1994, for the installation of the Cleaver Brooks boiler. Permit #2809-02 was on October 20, 1999 for clarification and update of permit language. Permit #2809-03 was issued August 31, 2000 to allow more operational flexibility with the natural gas consumption limit for the Cleaver Brooks boiler. Permit #2809-04 was issued June 28, 2001 to document a de minimis change relative to replacement of a log de-barker. The current air quality permit (#2809-05) was issued January 23, 2002 to modify the testing requirements.

Operating Permit #**OP2809-00** was issued on February 24, 2000. On March 18, 2002, the Department received a letter from L-P requesting a change in the responsible official for the Belgrade facility. In accordance with the Administrative Rules of Montana (ARM) 17.8.1225, the Department updated Section I, General Information, of the operating permit to identify Bill Fleming as the responsible official for the L-P Belgrade facility. In addition, on May 17, 2002, the Department received notification of several other changes to the Title V operating permit. Operating Permit #**OP2809-01** was issued as a significant modification on November 9, 2002.

The air quality in the area surrounding the Belgrade facility is classified as attainment/unclassifiable and the Montana State Implementation Plan does not impose any operating restrictions on the facility.

The Montana Private Property Assessment Act requires analysis of every proposed state agency administrative rule, policy, permit condition or permit denial, pertaining to an environmental matter, to determine whether the state action constitutes a taking or damaging of private real property that requires compensation under the Montana or U.S. Constitution. As part of issuing an operating permit, the Department is required to complete a Taking and Damaging Checklist. As required by 2-10-101 through 105, Montana Code Annotated (MCA), the Department conducted a private property taking and

damaging assessment and determined there are no taking or damaging implications. The checklist was completed on February 6, 2003.

#### **D. Current Permit Action**

On February 13, 2003, L-P submitted a letter to the Department requesting an administrative amendment to correct two errors in the operating permit. The first correction is to change the testing schedule frequency for the Wellons Boiler (EU01) from every four years to every five years as previously approved. The second correction is in the table in Section III.C of the permit to change the natural gas combustion limit for the Cleaver Brooks boiler (EU02) from an hourly limit to an annual limit. Operating Permit #**OP2809-02** replaces OP2809-01.

#### **E. Compliance Designation**

The L-P facility was last inspected on February 5, 2003, and found to be in compliance with all applicable requirements. The Department has no reason to believe that the facility is not in compliance with all applicable requirements at the time of issuance of the operating permit.

### **SECTION II. SUMMARY OF EMISSION UNITS**

#### **A. Facility Process Description**

The facility receives raw logs that are sorted and stored prior to being debarked and cut to length. The logs are then processed through various saws into the proper dimension. The rough studs are then dried in the kilns and planed to produce the finished product.

Steam for the facility is provided by a Wellons-Wicks hog fuel fired boiler rated at 16,000 pounds/hour of steam. As a backup, L-P also operates a Cleaver Brooks natural gas fired boiler with a maximum capacity of 13,000 pounds/hour of steam.

By-products from the stud production include: Bark which is separated into hog fuel for the boiler and beauty bark to be sold off-site; Sawdust which is collected via cyclone and loaded onto trucks for outside sale; Shavings from the planer and moulder which are collected via cyclone and sold off-site; and chips which are collected and sold off-site.

## B. Emission Units and Pollution Control Device Identification

The emission units regulated by this permit are the following (ARM 17.8.1211):

Emissions Unit ID	Description	Pollution Control Device/Practice
EU1	Wellons Boiler	Multiclone
EU2	Cleaver Brooks Boiler	None
EU3	Lumber Dry Kiln	None
EU4	Planer Cyclone	Cyclone acts as control device
EU5	Shavings Truck Bin Cyclone	Cyclone acts as control device
EU6	Molder Cyclone	Cyclone acts as control device
EU7	Shavings Truck Loading	None
EU8	Log Sawing	None
EU9	Vehicle Traffic Fugitives	Water or Chemical Dust Suppressants
EU10	Log Debarking Operations – Cambio Log Debarker	None
EU11	Hog Fuel Bin Cyclone	Cyclone acts as control device

## C. Categorically Insignificant Sources/Activities

The following table of insignificant sources and/or activities were provided by L-P to assist in understanding the facility's layout. Because there are no requirements to update such a list, the emissions units and/or activities may change from those specified in the table.

Emissions Unit ID	Description
IEU1	Fuel Bin Cyclone
IEU2	Sawdust Bin Cyclone
IEU3	Antifreeze Storage and Handling
IEU4	Ash Handling
IEU5	Beauty Bark Handling
IEU6	Vehicle Fueling Tanks (Gasoline and Diesel)
IEU7	Chipping and Chip Handling
IEU8	Honing Oil Storage and Handling
IEU9	Space Heaters
IEU10	Knife Sharpening
IEU11	Log Debarking
IEU12	Lumber Stenciling

Emissions Unit ID	Description
IEU13	Motor Oil Storage and Handling
IEU14	Rail Car Loading with Chips
IEU15	Sawdust Truck Bin Venting
IEU16	Sawdust Truck Loading
IEU17	Shavings Truck Bin Cyclone
IEU18	Transmission Fluid Storage and Handling
IEU19	Used Oil Storage and Handling
IEU20	Sawdust Storage Pile (Hog Fuel Storage Pile)

## **SECTION III. PERMIT CONDITIONS**

### **A. Emission Limits and Standards**

#### **Wellons Boiler (EU1)**

The Department has determined that the emission limit that applies to the Wellons boiler is 7.97 lbs/hour from Preconstruction Permit #2809-01. This limit applies because it is more stringent than the limit imposed by applying the fuel burning equation for new sources found in ARM 17.8.309.

#### **Cleaver Brooks Boiler (EU2)**

The Cleaver Brooks boiler is limited to 110.3 million ft<sup>3</sup> during any rolling 12-month time period of natural gas consumed by a condition in Preconstruction Permit #2809-03. This limit was placed on the equipment to ensure that emissions are not significantly greater than those on which the permit analysis was performed.

#### **Lumber Dry Kilns (EU3)**

The Lumber Dry Kilns are subject to an opacity limit of 20% in accordance with ARM 17.8.304. Further, the Lumber Dry Kilns are subject to ARM 17.8.310 (process weight rule) as applicable.

#### **Material Handling Cyclones – Planer Cyclone (EU4), Shavings Truck bin Cyclone (EU5), Moulder Cyclone (EU6), and Hog Fuel Bin Cyclone (EU11)**

The Material Handling Cyclones are subject to an opacity limit of 20% in accordance with ARM 17.8.304. Further, the Material Handling Cyclones are subject to ARM 17.8.310 (process weight rule) as applicable.

#### **Material Storage, Loading, Processing – Shavings Truck Loading (EU7), Log Sawing (EU8), Log Debarking – Cambio Log Debarker (EU10)**

Material Storage, Loading, and Processing from the Shavings Truck Loading Area, Log Sawing operations, and Log Debarking operations at the facility are subject to an opacity limit of 20% in accordance with ARM 17.8.304. Further, these operations are subject to reasonable precautions in accordance with ARM 17.8.308 and ARM 17.8.310 (process weight rule) as applicable.

#### **Fugitive Emissions – Vehicle Traffic (EU9)**

Vehicle Traffic fugitive emissions are subject to an opacity limit of 20% and reasonable precautions in accordance with ARM 17.8.308.

### **B. Monitoring Requirements**

ARM 17.8.1212(1) requires that all monitoring and analysis procedures or test methods required under applicable requirements are contained in operating permits. In addition, when the applicable requirement does not require periodic testing or monitoring, periodic monitoring must be prescribed that is sufficient to yield reliable data from the relevant time period that is representative of the source's compliance with the permit.

The requirement for testing, monitoring, recordkeeping, reporting, and compliance certification sufficient to assure compliance does not require the permit to impose the same level of rigor for

all emissions units. Furthermore, it does not require extensive testing or monitoring to assure compliance with the applicable requirements for emission units that do not have significant potential to violate emission limitations or other requirements under normal operating conditions.

When compliance with the underlying applicable requirement for an insignificant emissions unit is not threatened by lack of regular monitoring and when periodic testing or monitoring is not otherwise required by the applicable requirement, the status quo (**i.e., no monitoring**) will meet the requirements of ARM 17.8.1212(1). Therefore, the permit does not include monitoring for insignificant emissions units.

The permit includes periodic monitoring or recordkeeping for each applicable requirement. The information obtained from the monitoring and recordkeeping will be used by L-P to periodically certify compliance with the emission limits and standards. However, the Department may request additional testing to determine compliance with the emission limits and standards.

#### Wellons Boiler (EU1)

Since replacing the multiclone controlling particulate emissions from the Wellons boiler in 1994, L-P has shown compliance with particulate and opacity limits. The Department has determined that semiannual Reference Method 9 visual observations and Stack testing in accordance with Method 5 every four years are sufficient to demonstrate compliance with the opacity and particulate limits for the boiler.

#### Cleaver Brooks Boiler (EU2)

The Cleaver Brooks boiler is limited to 110.3 million ft<sup>3</sup> during any rolling 12-month time period of natural gas consumed by a condition in Preconstruction Permit #2809-03. This limit was placed on the equipment to ensure that emissions are not significantly greater than those on which the permit analysis was performed.

#### Dry Kilns (EU3) and Material Handling Cyclones (EU4, EU5, EU6, and EU11)

The lumber dry kilns have a very low potential to violate the particulate and opacity limits imposed by the state's general process weight and opacity rules. Emissions from the material handling cyclones are very consistent based on field observations. The cyclones do have the potential for failure, however, this failure is rarely instantaneous but occurs gradually over time because of erosion of the cyclone itself.

The Department determined that Method 9 observations as required by the Department are adequate to demonstrate continued compliance with the opacity limits for the Dry Kilns and Material Handling Cyclones.

#### Materials Storage, Loading, Processing: Shavings Truck Loading (EU7), Log Sawing (EU8), Log Debarking – Cambio Log Debarker (EU10)

Materials storage loading and processing operations at the facility including the above cited operations are all limited to 20% opacity, the use of reasonable precautions to limit fugitive emissions, and the process weight rule as applicable in ARM 17.8.310.

The Department determined that a Method 9 source test as required by the Department is applicable to these sources. For the purposes of compliance monitoring, L-P shall conduct a weekly visual survey of the visible emissions from the shavings truck loading area, process sawing, and log debarking operations. Conducting a visual survey does not relieve L-P of a liability for a violation documented with a Method 9.



## Fugitive Emissions – Vehicle Traffic (EU9)

For the purposes of compliance monitoring, L-P shall conduct a weekly visual survey of the visible emissions from vehicle traffic. Conducting a visual survey does not relieve L-P of a liability for a violation documented with a Method 9.

### **C. Test Methods and Procedures**

The operating permit may not require testing for all sources if routine monitoring is used to determine compliance, but the Department has the authority to require testing if deemed necessary to determine compliance with an emission limit or standard. In addition, L-P may elect to voluntarily conduct compliance testing to confirm its compliance status.

### **D. Recordkeeping Requirements**

L-P is required to keep all records listed in the operating permit as a permanent business record for at least five years following the date of the generation of the record.

### **E. Reporting Requirements**

Reporting requirements are included in the permit for each emissions unit and Section V of the operating permit “General Conditions” explains the reporting requirements. However, L-P is required to submit semi-annual and annual monitoring reports to the Department and to annually certify compliance with the applicable requirements contained in the permit. The reports must include a list of all emission limit and monitoring deviations, the reason for any deviation, and the corrective action taken as a result of any deviation.

### **F. Public Notice**

As this permitting action is for an administrative amendment, no public notice is required for this action.

### **G. Draft Permit Comments Operating Permit #OP2809-00**

<b>Permit Section</b>	<b>Facility Comment</b>	<b>Department Response</b>
Section I, General Information	Incorrect Telephone Number for Plant Manager, Bill Fleming	Corrected in Department Decision
Section II.B.2, Wellons Boiler	Permit Condition / Limit Language	No Change, As Appears in Pre-Construction Permit #2809-02
Title V Application	Emission Factor Change	Noted, on File with the Department.
Title V Application	Incorrect Reported Equipment Capacity – Lumber Dry Kilns	Noted, on File with the Department

### **H. Draft Permit Comments Operating Permit #OP2809-01**

Permit Section	Facility Comment	Department Response
III.C.4 – Permit #OP2809-01	Section III.C.4 lists the natural gas consumption limit on the Cleaver Brooks Boiler (EU2) as 12,600 ft <sup>3</sup> /hr. This limit is no longer applicable. In Preconstruction Permit #2809-03 the limit was changed from an hourly limit to an annual limit of 110.3 MMft <sup>3</sup> /yr. Please replace the hourly limit with the appropriate annual limit.	The Department replaced the hourly limit with the appropriate annual limit as requested.
III.C.6 – Permit #OP2809-01	Section III.C.6 limits steam flow from the Cleaver-Brooks Boiler as a compliance demonstration for the limit on natural gas consumption. Because the limit has been changed to an annual gas usage limit, it is more appropriate to monitor natural gas use on a monthly basis and use this to calculate the rolling 12-month total of actual natural gas usage. L-P requests that Section III.C.4 be changed to language similar to that in Section III.D.3 of Preconstruction Permit #2809-05.	The Department replaced the compliance demonstration in Section III.C.6 as requested.
III.C.8 – Permit #OP2809-01	Section III.C.8 requires L-P to operate a steam flow recorder to demonstrate compliance with Section III.C.4. This requirement should be replaced with monthly recordkeeping of natural gas usage.	The Department replaced the recordkeeping requirement in Section III.C.8 as requested.
III.C.9 – Permit #OP2809-01	Section III.C.9 should be changed to require verification of the natural gas flow from the boiler rather than the steam flow.	The Department changed the requirement in Section III.C.9 as requested.
III.F.5 – Permit #OP2809-01	Section III.F.5 requires weekly visual survey of the log sawing process. Most of the sawing process occurs indoors and discussions with Warren Norton of your Department indicate that visual surveys of the sawing process itself are probably unrealistic. We request that this be changed to a weekly visual survey of the openings in the sawmill building where pollutants would actually be entering the atmosphere.	The Department modified Section III.F.5 as requested.
III.A and III.B – Technical Review Document (TRD) #2809-01	The TRD needs to be changed to reflect the requested changes to the Cleaver-Brooks Boiler boiler requirements above.	The Department modified Section III.A. and Section III.B of the TRD as requested.

Permit Section	Facility Comment	Department Response
III.B	Section III.B of the TRD for the Dry Kilns and Material Handling Cyclones indicates semiannual Method 9 Opacity Observations are required. Please change this analysis to reflect that Method 9 testing is only required if requested by the Department.	The Department modified Section III.B as requested.

#### **SECTION IV. NON-APPLICABLE REQUIREMENTS ANALYSIS**

Pursuant to ARM 17.8.1221, L-P requested a permit shield for all non-applicable regulatory requirements and regulatory orders identified in Table 8-1 of the permit application.

The following table outlines those requirements that L-P had identified as non-applicable in the permit application but, after Department review, will not be included in the operating permit as non-applicable. The table includes both the applicable requirement and reason that the Department did not identify this requirement as non-applicable.

<b>Rule Citation</b>	<b>Reason</b>
40 CFR Part 51 40 CFR Part 52 40 CFR Part 53 40 CFR Part 54 40 CFR Part 56 40 CFR Part 58 40 CFR Part 67 ARM 17.8.130 ARM 17.8.142 ARM 17.8.510 ARM 17.8.704 ARM 17.8.707 ARM 17.8.730 ARM 17.8.731 ARM 17.8.732 ARM 17.8.808 ARM 17.8.825 ARM 17.8.826 ARM 17.8.1108 ARM 17.8.1109 ARM 17.8.1210 ARM 17.8.1211 ARM 17.8.1212 ARM 17.8.1213 ARM 17.8.1214 ARM 17.8.1215 ARM 17.8.1222 ARM 17.8.1223 ARM 17.8.1225 ARM 17.8.1228 ARM 17.8.1231 ARM 17.8.1232 ARM 17.8.1233 ARM 17.80.105	Although these rules contain requirements for the regulatory authorities and not major sources, these rules can be used as authority to impose specific requirements on a major source.
40 CFR Part 66	This rule does not have specific requirements and may or may not be relevant to a major source and should never be listed in the applicable or non-applicable requirements.
40 CFR Part 62	This rule does not have specific requirements and is always relevant to a major source and should never be listed in the applicable or non-applicable requirements.
ARM 17.8.120 ARM 17.8.121 ARM 17.8.131 ARM 17.8.140 ARM 17.8.141 ARM 17.8.403 ARM 17.8.511 ARM 17.8.514 ARM 17.8.515 ARM 17.8.611 ARM 17.8.612 ARM 17.8.613 ARM 17.8.614 ARM 17.8.615	This rule is procedural and has specific requirements that may become relevant to a major source during the permit span.

ARM 17.8.734 ARM 17.8.825 ARM 17.8.826 ARM 17.8.905 ARM 17.8.906 ARM 17.8.1005 ARM 17.8.1006 ARM 17.8.1007 ARM 17.8.1220 ARM 17.8.1221 ARM 17.8.1224 ARM 17.8.1226 ARM 17.8.1227 ARM 17.80.102 ARM 17.80.103 ARM 17.80.104 ARM 17.80.106	This rule is procedural and has specific requirements that may become relevant to a major source during the permit span.
ARM 17.8.105 ARM 17.8.106 ARM 17.8.202 ARM 17.8.204 ARM 17.8.205 ARM 17.8.206 ARM 17.8.214 ARM 17.8.230 ARM 17.8.326 ARM 17.8.717 ARM 17.8.804 ARM 17.8.828	These rules are applicable to the source and may contain specific requirements for compliance.
ARM 17.8.101 ARM 17.8.103 ARM 17.8.201 ARM 17.8.301 ARM 17.8.302 ARM 17.8.401 ARM 17.8.501 ARM 17.8.601 ARM 17.8.701 ARM 17.8.702 ARM 17.8.801 ARM 17.8.802 ARM 17.8.901 ARM 17.8.902 ARM 17.8.904 ARM 17.8.1001 ARM 17.8.1002 ARM 17.8.1004 ARM 17.8.1101 ARM 17.8.1103 ARM 17.8.1201 ARM 17.8.1202 ARM 17.8.1203 ARM 17.8.1204 ARM 17.8.1234 ARM 17.80.101	These rules consist of either a statement of purpose, applicability statement, regulatory definitions or a statement of incorporation by reference. These types of rules do not have specific requirements associated with them.

## **SECTION V. FUTURE PERMIT CONSIDERATIONS**

### **A. MACT Standards**

As of February 13, 2003, the Department is not aware of any future MACT Standards that may be promulgated that will affect this source.

### **B. NESHAP Standards**

As of February 13, 2003, the Department is not aware of any future NESHAP Standards that may be promulgated that will affect this source.

### **C. NSPS Standards**

As of February 13, 2003, the Department is not aware of any NSPS Standards that are applicable to this source. The hog fuel boiler is not subject to 40 CFR Part 60, Subpart Dc, because L-P has not commenced construction, modification, or reconstruction of the boiler after June 9, 1989.

The 40 CFR Part 60 (NSPS) definition of modification is "any physical change in, or change in the method of operations of, an existing facility which increases the amount of any air pollutant (to which a standard applies) emitted into the atmosphere by that facility or which results in the emission of any air pollutant (to which a standard applies) into the atmosphere not previously emitted. Although some work has been done on the boiler since the trigger date, including installation of the Hurst boiler multiclone, no changes have been made which resulted in an increase in regulated pollutants.

### **D. Risk Management Plan**

As of February 13, 2003, this facility does not exceed the minimum threshold quantities for any regulated substance listed in 40 CFR 68.115 for any facility process. Consequently, this facility is not required to submit a Risk Management Plan.

If a facility has more than a threshold quantity of a regulated substance in a process, the facility must comply with 40 CFR 68 requirements no later than June 21, 1999; three years after the date on which a regulated substance is first listed under 40 CFR 68.130; or the date on which a regulated substance is first present in more than a threshold quantity in a process, whichever is later.